

August 9, 2024

VIA ECF

The Honorable Pamela K. Chen
United States District Judge
United States District Court, Eastern District
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Securities Exchange Commission v. Xia, et al.
U.S. Dist. Ct., Dkt. No. 21-Civ-5350 (PKC)**

Dear Judge Chen:

I respectfully write in reference to the above captioned matter, and in direct response to the Letter of August 8, 2024, filed by Mr. Robert J. Hantman.

As you may be aware, I served as construction counsel to Mr. Xia, and his affiliated entities, during the period between June of 2018, and February, 2022. Following several months of non-payment, due to the asset freeze implemented by this Court, I was forced to formally withdraw from such representation in February of 2022.

Consequently, I have repeatedly advised counsel for Mr. Xia, as well as the Court-appointed monitor, that my office has an enormous balance of unpaid bills, similar to the litany of other firms retained by Mr. Xia throughout these proceedings.

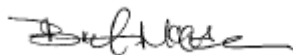
While I echo the sentiment of Mr. Hantman in that it is pleasing to see a resolution finally reached, I must respectfully also request that I may be paid my unpaid invoicing.

Annexed hereto is a transmittal that was sent to Meyer Suozzi back in February, also requesting such consideration.

In the event Your Honor is so inclined to grant Mr. Hantman's request, we reiterate our position and claim to unpaid monies as well.

Thank You for your time and attention to this Matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Bret L. McCabe", with a stylized flourish at the end.

Bret L. McCabe, Esq.

Law Office of
Bret L. McCabe
7 Copperfield Lane
Old Brookville, NY 11545
718.213.0123
bmccabe@bmccabelaw.com

February 14, 2024

VIA EMAIL

Meyer Suozzi English & Klein P.C.
990 Stewart Avenue
Garden City, NY 11530
Attention: Paul F. Millus, Esq.
PMillus@msek.com

RE: Fleet Financial Group, Inc., Richard Xia, Eastern Emerald Group, LLC

Mr Millus:

As you are aware, our firm previously served as counsel to Fleet Financial Group, Inc., Eastern Emerald Group, LLC, Yi Xia a/k/a Richard Xia, Racanelli Constriction Group, Inc., Perini Group, Inc., and numerous other affiliated entities, parents, subsidiaries, and related companies thereto.

Despite providing legal representation and various services for the aforementioned entities between the period of September, 2021 through February of 2022, our office has a substantial balance due and owing from Mr. Xia.

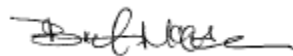
Our records reflect an open balance of at least \$96,454.13, which does not include the filing fees incurred as part of our actions undertaken to withdraw from the representation within numerous matters, and/or other costs incurred following the date of our termination of representation, February 1, 2022.

Therefore, in the event Meyer Suozzi English & Klein, P.C. is in possession of escrow funds related to Mr. Xia, or any of his affiliated entities, our office hereby demands payment of our legal invoices from such funds, prior to remittance back to Mr. Xia.

Thank you for your attention to this matter.

In the event you wish to discuss, please feel free to contact our office.

Very Truly Yours,



Bret L. McCabe